

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**In Re: Annette Powell,
Debtor.**

**Chapter 13
Case No. 24-26061-GMH**

**OBJECTION TO 21ST MORTGAGE CORPORATION'S
MOTION FOR RELIEF**

Debtor, Annette Powell, by her attorneys of Debt Advisors S.C., hereby objects and represents that:

1. The Debtor filed a Chapter 13 Bankruptcy on November 11, 2024.
2. On May 12, 2025, Creditor, 21st Mortgage Corporation, filed a Motion for Relief from Stay alleging that the Debtor has fallen behind on mortgage payments that have come due since her case was filed. The creditor amended its motion on May 14, 2025.
3. The Debtor does not dispute the alleged missed payments.
4. Counsel is holding certified "good faith" funds in the amount of \$3,082.00 from the Debtor. The funds on hand bring the mortgage contractually current through June, with the exception of Movant's attorney's fees and costs.
5. The Debtor agrees to the filing of a supplemental claim for any remaining attorney's fees and costs to be paid back through her plan.
6. The Debtor agrees to a "doomsday" on monthly payments beginning with July 2025.
7. Further, the Debtor contends there is equity in the subject property, and it is the Creditor's burden to show a lack of equity in the property. Specifically, the home was listed on the Debtor's schedules with a value of \$110,100.00. Per the motion for relief, the balance of Creditor's mortgage is currently \$82,584.69.
8. Given the above, the Debtor asserts that the Movant has not shown "cause" to terminate the stay as is required by 11 U.S.C. § 362(d).
9. The Debtor requests that the motion is denied subject to the above.

WHEREFORE, the Debtor requests that the motion is denied, or that a hearing is scheduled on this objection.

Dated this 27th day of May, 2025.

Debt Advisors, S.C.
By: /s/ Michael S. Georg
Michael S. Georg, #1029502

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